

Ashlee B. Hesman, Nevada Bar No. 012740
STRUCK LOVE BOJANOWSKI & ACEDO, PLC
3100 West Ray Road, Suite 300
Chandler, Arizona 85226
Tel.: (480) 420-1600
Fax: (480) 420-1695
ahesman@strucklove.com

Gina G. Winspear
Nevada Bar No. 005552
DENNETT WINSPEAR, LLP
3301 North Buffalo Drive, Suite 195
Las Vegas, Nevada 89129
Tel.: (702) 839-1100
Fax: (702) 839-1113
GWinspear@dennettwinspear.com

*Attorneys for Defendants CoreCivic, Inc. and
CoreCivic of Tennessee*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SANDRA TOCCI, as Special Administrator
and Personal Representative of the Estate of
Frank E. Tocci, Deceased; and Sandra Tocci,
as Heir and Mother of FRANK E. TOCCI,
Deceased,

Plaintiff,

v.

CORECIVIC, INC., f/k/a/ CORRECTIONS
CORPORATION OF AMERICA;
CORECIVIC OF TENNESSEE, LLC; BRIAN
KOEHN, Warden, Nevada Southern Detention
Center; DOE INDIVIDUALS I-XXV; ROE
ENTITIES I-X, inclusive,

Defendants.

Case No. 2:22-cv-02174-GMN-DJA

**STIPULATION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S COMPLAINT**

(Second Request)

Pursuant to LR IA 6-1, the parties stipulate to extend the deadline for Defendants
CoreCivic & CoreCivic of Tennessee to respond to Plaintiff's Complaint, which was removed
to this Court from the Fifth Judicial District Court for Nye County on December 30, 2022.
This is the second stipulation for extension of time for Defendants to respond to Plaintiff's

1 Complaint.

2 Defendants' current deadline to file a responsive pleading is January 20, 2023. The
 3 parties stipulate to extend this deadline to February 3, 2023, to allow time to further meet and
 4 confer regarding possible dismissal of some of Plaintiff's claims.¹ This additional time is
 5 needed, in part, because Plaintiff is considering amending his Complaint, which would render
 6 any motion to dismiss moot. To conserve party and judicial resources, the parties wish to
 7 avoid dispositive-motion practice where possible. As such, the parties stipulate to extend the
 8 deadline for Defendants to respond to Plaintiff's Complaint from January 20 to February 3,
 9 2023. This brief requested extension is made in good faith and not for purposes of delay.

10 DATED this 20th day of January, 2023.

11
 12 LAW OFFICES OF MICHAEL GOWDEY

STRUCK LOVE BOJANOWSKI & ACEDO, PLC

13
 14 By: /s/ Michael I. Gowdey (w/ permission)

By: /s/ Ashlee B. Hesman

15 Michael I. Gowdey
 16 815 S. Casino Center Blvd.
 Las Vegas, NV 89101
mgowdey@aol.com
Attorneys for Plaintiff

Ashlee B. Hesman
 3100 West Ray Road, Suite 300
 Chandler, Arizona 85226
ahesman@strucklove.com

Gina G. Winspear
 DENNETT WINSPEAR
 3301 North Buffalo Dr., Suite 195
 Las Vegas, NV 89129
GWinspear@dennettwinspear.com

*Attorneys for Defendants CoreCivic, Inc. and
 CoreCivic of Tennessee*

21
 22
 23 **IT IS SO ORDERED:**

24 

25 UNITED STATES MAGISTRATE JUDGE

26 Dated: 1/23/2023

27
 28 ¹ The parties have already participated in one meet and confer and exchanged multiple email correspondence regarding these issues.

CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2023, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Michael I. Gowdey mgowdey@aol.com

I hereby certify that on this same date, I served the attached document by U.S. Mail, postage prepaid, on the following, who is not a registered participant of the CM/ECF System:

N/A

By: /s/ S. Berry